

TAB 8

DELL, INC.'s DEPOSITION DESIGNATIONS

**IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
INACOM CORP., <u>et al.</u> ,)	
)	Case No. 00-2426 (PJW)
Debtors.)	
_____)	
)	
INACOM CORP., on behalf of affiliated)	
Debtors,)	Civil Action no. 04-582-GMS
)	Adv. No. 02-3499
Plaintiff,)	
)	
v.)	
)	
DELL COMPUTER CORPORATION, <u>et al.</u> ,)	
)	
Defendants.)	
_____)	

DELL, INC.'S DEPOSITION DESIGNATIONS

JOHN ALAN DUGAN:

Page:Line

6:7 – 6:10
 22:19 – 22:25
 28:14 – 29:24
 36:23 – 36:24
 38:5 – 38:13
 46:20 – 48:7
 48:24 – 49:6
 72:3 – 72:17
 75:4 – 75:13; 75:16
 76:24 – 78:16
 79:10 – 79:11
 80:15 – 80:22
 83:2 – 84:14
 87:18 – 87:20; 88:5
 92:2 – 93:9
 105:17 – 107:16
 118:15 – 118:19

Page:Line

17:21 – 21:10
 25:22 – 26:10
 35:16 – 36:11
 37:3 – 37:6
 39:2 – 40:2
 48:11 – 48:18
 57:7 – 58:1
 73:4 – 74:21
 76:18 – 76:19; 76:22
 79:5 – 79:8
 79:13 – 79:16
 81:6 – 81:8
 87:11 – 87:16
 91:22 – 91:25
 95:9 – 96:24
 115:12 – 115:16
 118:24 – 119:20

JOHN T. FRASCA:**Page:Line**

8:9 – 8:11
 11:15 – 12:21
 15:2 – 15:12
 26:25 – 27:4
 31:21 – 32:1
 33:17 – 33:21
 39:5 – 40:4
 42:10 – 42:21
 46:9 – 46:14
 48:15 – 48:16
 50:5 – 50:22
 55:23 – 56:2
 57:9 – 58:16
 59:23 – 60:13
 69:5 – 70:22
 71:12 – 72:4

Page:Line

8:19 – 9:17
 14:12 – 14:14
 16:1 – 16:21
 29:18 – 30:2
 32:25 – 33:11
 35:9 – 35:11
 41:15 – 42:3
 43:22 – 44:5
 47:2 – 48:12
 49:19 – 50:1
 53:2 – 53:14
 57:3 – 57:7
 59:5 – 59:20
 66:20 – 68:17
 71:9 – 71:10
 72:23 – 73:8

LEON KERKMAN:**Page:Line**

6:8 – 6:9
 12:6 – 13:21
 30:25 – 31:16
 56:5-56:19
 60:24 – 61:3
 64:5 – 64:13

Page:Line

11:7 – 11:18
 14:16 – 16:8
 48:24 – 49:9
 57:11 – 58:8
 63:25 – 64:4

NANCY PEARSON:**Page:Line**

6:8 – 6:10
 10:10 – 11:1
 12:8 – 12:22
 16:16 – 17:20
 19:7 – 19:11
 20:3 – 21:1
 24:15 – 24:20
 25:14 – 25:17
 26:20 – 27:17
 30:3 – 30:11
 34:10 – 34:25

Page:Line

7:12 – 8:10
 11:5 – 11:15
 13:1 – 13:24
 18:2 – 19:1
 19:17 – 19:24
 21:9 – 21:18
 25:1 – 25:3
 25:20 – 25:22
 27:23 – 28:19
 32:17 – 32:21
 40:12 – 40:20

NANCY PEARSON (cont'd.):

47:1 – 47:16
54:19 – 55:3

49:15 – 52:7

JAY SAMUELSON:**Page:Line**

7:8 – 7:10
15:24 – 16:10
19:7 – 19:13
20:14 – 20:21
25:5 – 25:6
26:11 – 27:4
29:17 – 29:21
32:9 – 33:11
34:12 – 34:24
36:7 – 36:17
39:1 – 40:4
43:1 – 45:3
45:15 – 45:23
54:9 – 54:13
59:3 – 59:19
60:24 – 61:5
63:16 – 64:5
74:12 – 74:16
78:7 – 78:9
78:18 – 78:22
79:23 – 80:18
81:11 – 83:11
84:1 – 84:2
96:22 – 97:3
99:4 – 100:3
104:20 – 105:2

Page:Line

15:5 – 15:12
17:23 – 18:24
20:1 – 20:6
22:3 – 24:21; 25:3
25:11 – 25:15
29:8 – 29:11; 29:15
30:4 – 30:21
33:14 – 34:5
35:9 – 36:3
36:20 – 38:23
41:12 – 42:11
44:9 – 45:3
45:25 – 46:7
58:19 – 58:25
59:21 – 59:24
61:23 – 62:14
65:22 – 67:7
77:13 – 78:1; 78:5
78:12 – 78:13
79:9 – 79:18
80:21 – 81:8
83:18 – 83:21
96:12 – 96:14
98:5 – 98:24
100:18 – 103:5
113:2 – 113:15

KAREN WALLINGFORD:**Page:Line**

6:17 – 6:19
16:3 – 16:9
21:15 – 21:16
24:23 – 25:4
25:21 – 26:6

Page:Line

14:2 – 15:18
21:1 – 21:5
21:18 – 21:20; 21:24
25:7 – 25:11
48:14 – 48:23

BEN K. WELLS:**Page:Line**

8:3 – 8:6
 11:11 – 11:13
 14:2 – 14:15
 50:6 – 51:5
 52:12 – 52:17
 54:1 – 54:2
 59:11 – 59:12
 61:6 – 61:8
 63:4 – 63:13
 66:15 – 67:1
 67:14 – 67:16
 72:20 – 73:9
 74:8 – 74:12
 75:9 – 75:15
 76:15 – 77:3

Page:Line

11:3 – 11:7
 11:18 – 13:6
 49:18 – 49:25
 51:11 – 52:8
 53:1 – 53:25
 54:21 – 55:20
 59:15 – 60:8
 61:14 – 61:22
 66:13 – 67:1
 67:8 – 69:10
 67:18 – 69:10
 73:10 – 73:25
 74:15 – 74:25
 76:1 – 76:9

SUSAN WILLETTS:**Page:Line**

8:21 – 8:24
 16:22 – 22:1
 26:1 – 26:20
 27:18 – 28:2
 31:18 – 32:5
 34:7 – 34:11
 38:20 – 39:5
 40:9 – 40:11; 40:15
 41:8 – 42:4
 44:6 – 45:4
 47:3 – 48:1
 49:13 – 50:21
 52:13 – 52:24
 53:15 – 53:24
 55:20 – 56:13
 60:13 – 63:3
 65:16 – 66:1
 68:2 – 68:5
 74:15 – 77:5

Page:Line

13:19 – 14:18
 22:10 – 25:1
 27:3 – 27:11
 29:18 – 31:14
 32:13 – 33:12
 36:7 – 38:8
 40:2 – 40:7
 40:17 – 41:4
 42:8 – 43:23
 46:12 – 46:19
 48:10 – 49:4
 51:12 – 52:2
 53:1 – 53:8
 54:14 – 55:3
 57:18 – 60:8; 60:11
 63:17 – 64:3
 66:17 – 67:10
 68:17 – 69:5

ROBERT M. WOODS:**Page:Line**

7:2 – 7:5
 12:2 – 12:9
 13:2 – 13:12
 14:3 – 14:17
 15:2 – 15:14
 16:2 – 16:4
 17:2 – 17:5
 21:19 – 21:25
 22:9 – 22:10
 23:7 – 23:14
 25:2 – 25:12
 26:2 – 26:6
 29:14 – 29:25
 32:2 – 32:25
 33:18 – 33:24
 35:7 – 35:19
 46:2 – 46:12
 47:2 – 47:13
 48:2 – 48:6
 48:17 – 48:23
 50:17 – 50:25
 54:12 – 54:25
 58:7 – 58:18
 59:8 – 59:9
 60:2 – 60:25
 61:18 – 61:20
 62:2 – 62:3
 63:18 – 63:25
 65:2 – 65:4
 72:23 – 72:25
 73:6 – 73:10
 74:2 – 74:10
 76:23 – 76:25
 78:2 – 78:17
 80:21 – 80:23; 80:25
 81:6 – 81:11
 82:2 – 82:15
 82:24 – 82:25
 83:11 – 83:25
 84:11 – 84:22
 85:2 – 85:3
 86:2 – 86:7
 86:16 – 86:23; 86:25

Page:Line

11:12 – 11:25
 12:20 – 12:25
 13:24 – 13:25
 14:23 – 14:25
 15:16 – 15:25
 16:7 – 16:25
 20:16 – 20:24; 21:2
 22:2 – 22:6
 23:2 – 23:4
 24:24 – 24:25
 25:21 – 25:25
 29:7 – 29:10
 30:2 – 30:4
 33:5 – 33:15
 34:2 – 34:17
 45:20 – 45:25
 46:23 – 46:24
 47:22 – 47:25
 48:10 – 48:13
 50:8 – 50:10
 51:3 – 51:12
 55:2 – 55:3
 59:5 – 59:6
 59:15 – 59:22
 61:2 – 61:4
 61:23 – 61:25
 62:11 – 62:25; 63:2
 64:2 – 64:25
 65:15 – 65:22
 73:2 – 73:4
 73:21 – 73:24
 75:17 – 75:20
 77:2 – 77:24
 78:25 – 79:14
 81:2 – 81:3
 81:24 – 81:25
 82:19 – 82:22
 83:2 – 83:6
 84:2 – 84:6
 84:24 – 84:25
 85:5 – 85:25
 86:9 – 86:14
 87:2 – 87:11

ROBERT M. WOODS cont'd.:**Page:Line**

87:13 – 88:6
 90:2 – 90:10
 91:2 – 91:23
 97:2 – 97:8
 97:17 – 97:18
 107:22 – 107:25
 108:21 – 108:25; 109:3
 109:24 – 109:25
 110:12 – 110:25
 111:21 – 111:25
 112:16 – 112:21
 113:2 – 113:4; 113:6
 129:22 – 129:25
 130:8 – 130:23; 130:25
 137:14 – 137:20
 138:2 – 138:5
 139:2 – 139:7
 139:23 – 139:25
 140:16 – 140:21; 140:24
 142:2 – 142:3
 143:2 – 143:4

Page:Line

89:19 – 89:25
 90:14 – 90:25
 96:8 – 96:25
 97:10; 97:15
 98:18 – 98:23; 98:25
 108:2 – 108:8
 109:18 – 109:20
 110:2 – 110:9
 111:2 – 111:5
 112:2 – 112:14
 112:23 – 112:25
 129:4 – 129:20
 130:2 – 130:6
 131:2 – 131:9; 131:11
 137:22 – 137:25
 138:20 – 138:25
 139:9 – 139:21
 140:2 – 140:14
 141:17 – 141:25
 142:5 – 142:25
 143:6 – 143:11

SCOTT SIMMILINK:**Page:Line**

6:8—6:10
 19:2—19:4
 23:11—23:16
 35:23—35:24

Page:Line

18:13—18:20
 20:22—21:8
 35:11—35:20

NONDAS (NONI) L. VITOLS:**Page:Line**

6:13 – 6:15
 9:1 – 9:11
 12:21 – 13:7

Page:Line

7:24 – 8:7
 9:15 – 10:25
 13:24 – 14:3

In addition to the foregoing page/line designations, Dell also states the following:

(i) Dell reserves the right to make any counter designations to any designations made by Inacom or by the Hewlett-Packard Company, pursuant to Federal Rule of Civil Procedure 32(a)(4);

(ii) Dell reserves the right to designate depositions or portions thereof of any witness identified by Inacom on Tab 1 hereto as a "will call" that Inacom does not call for live testimony at trial; and

(iii) Dell reserves the right to offer deposition testimony to rebut the testimony offered at trial by any witness(es) called by Inacom or for impeachment purposes.